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10 IN THE UNITED STATES BANKRUPTCY COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 NORTHERN DIVISION
13

14 **In re:**

15 **HVI CAT CANYON, INC.,**

16 Debtor.

17 Case No.: 9:19-bk-11573-MB
18 Assigned to Hon. Martin R. Barash
19 Chapter 11
20

21 **CALIFORNIA DEPARTMENT OF
CONSERVATION, DIVISION OF
OIL, GAS & GEOTHERMAL
RESOURCES' JOINDER TO:**

22 **(1) CALIFORNIA STATE LANDS
COMMISSION'S LIMITED
OBJECTION TO APPLICATION
FOR ORDER AUTHORIZING
AND APPROVING THE
EMPLOYMENT OF PACHULSKI
STANG ZIEHL & JONES LLP AS
COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS, EFFECTIVE AS OF
AUGUST 16, 2019 [Docket No.
346]; and**

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**(2) CALIFORNIA STATE LANDS
COMMISSION'S LIMITED
OBJECTION TO APPLICATION**

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5 **OF THE OFFICIAL COMMITTEE
6 OF UNSECURED CREDITORS
7 FOR AUTHORIZATION TO
8 RETAIN AND EMPLOY CONWAY
9 MACKENZIE, INC. AS
10 FINANCIAL ADVISOR,
11 EFFECTIVE AS OF AUGUST 16,
12 2019 [Docket No. 347]**

13 Date: October 28, 2019
14 Time: 10:00a.m.
15 Place: Courtroom 201
16 U.S. Bankruptcy Court
17 1415 State Street
18 Santa Barbara, CA 93101
19 Judge: Hon. Martin R. Barash

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21 The California Department of Conservation, Division of Oil, Gas &
22 Geothermal Resources, hereby joins: (1) the California State Lands Commission's
23 Limited Objection to Application for Order Authorizing and Approving the
24 Employment of Pachulski Stang Ziehl & Jones LLP as Counsel for the Official
25 Committee of Unsecured Creditors, Effective as of August 16, 2019 ("PSZJ
26 Objection") [Docket No. 346]; (2) the California State Lands Commission's
27 Limited Objection to Application of the Official Committee of Unsecured Creditors
28 for Authorization to Retain and Employ Conway MacKenzie, Inc. as Financial
Adviser, Effective as of August 16, 2019 ("CM Objection") [Docket No. 347]; and
(3) the California State Lands Commission's Response to Reply of the Official
Committee of Unsecured Creditors to the PSZJ Objection and CM Objection
("Reply") [Docket No. 422].

29 The Division opposes the Official Committee of Unsecured Creditors'
30 applications to employ Pachulski Stang Ziehl & Jones LLP as counsel to the
31 Official Committee of Unsecured Creditors [Docket No. 214], and to employ
32 Conway MacKenzie, Inc. as financial advisor to the Official Committee of

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2 Unsecured Creditors [Docket No. 219], for the reasons set forth in the PSZJ
3 Objection, the CM Objection, and the Reply.

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5 Dated: October 22, 2019

Respectfully submitted,

6 XAVIER BECERRA
7 Attorney General of California
8 CHRISTINA BULL ARNDT
Supervising Deputy Attorney General

9 /s/ *Mitchell E. Riske*

10 MITCHELL E. RISHE
11 Deputy Attorney General
Attorneys for the California
Department of Conservation,
Division of Oil, Gas & Geothermal
12 *Resources*

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

300 South Spring Street, Suite 1702
Los Angeles, California 90013

A true and correct copy of the foregoing document entitled:

**CALIFORNIA DEPARTMENT OF CONSERVATION, DIVISION OF OIL, GAS & GEOTHERMAL RESOURCES'
JOINDER TO:**

**(1) CALIFORNIA STATE LANDS COMMISSION'S LIMITED OBJECTION TO APPLICATION FOR ORDER
AUTHORIZING AND APPROVING THE EMPLOYMENT OF PACHULSKI STANG ZIEHL & JONES LLP AS
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, EFFECTIVE AS OF AUGUST 16,
2019 [Docket No. 346]; and**

**(2) CALIFORNIA STATE LANDS COMMISSION'S LIMITED OBJECTION TO APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR AUTHORIZATION TO RETAIN AND EMPLOY CONWAY
MACKENZIE, INC. AS FINANCIAL ADVISOR, EFFECTIVE AS OF AUGUST 16, 2019 [Docket No. 347]**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On October 22, 2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See Attachment

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On October 22, 2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Office of the U.S. Trustee
Brian Fittipaldi
1415 State Street, Suite 148
Santa Barbara, CA 93101

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on October 22, 2019, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Overnight Delivery
Hon. Martin R. Barash
United States Bankruptcy Court
Central District of California
21041 Burbank Boulevard, Suite 342 / Courtroom 303
Woodland Hills, CA 91367

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/22/2019
Date

Alfred Palma
Printed Name

/s/ Alfred Palma
Signature

VIA NOTICE ELECTRONIC FILING (NEF)

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H Alexander Fisch on behalf of Interested Party California Regional Water Quality Control Board, Central
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Ross Spence on behalf of Interested Party Harry E. Hagen, as Treasurer-Tax Collector of the County of Santa Barbara, California
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Ross Spence on behalf of Interested Party Santa Barbara Air Pollution Control District
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